

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**TATYANA A. BABAKAEVA,**

**Plaintiff,**

**v.**

**PAUL H. WILSON and  
WILSON & WILSON, P.C.,**

**Defendants.**

**Civil Action No.: 4:09cv58**

**MOTION TO STAY**

NOW COME the Defendants, Paul H. Wilson and Wilson & Wilson, P.C., by counsel, and move the Court to enter an Order staying the captioned matter and continuing the trial date for a period of 60 days on the grounds and for the reasons more specifically set forth in the attached Memorandum of Law.

**PAUL H. WILSON and WILSON & WILSON, P.C.**

By: /s/ James H. Shoemaker, Jr.  
James H. Shoemaker, Jr. (VSB 33148)  
Douglas E. Miller (VSB 38591)  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** on December 2, 2009, that I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following. I also served a true copy of the foregoing via first-class mail, postage prepaid, on:

Tatyana Babakaeva  
2124 Criston Drive  
Newport News, VA 23602

*Plaintiff, appearing pro se*

/s/ James H. Shoemaker, Jr.

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